

U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION X

1200 SIXTH AVENUE

SEATTLE, WASHINGTON 98101

REPLY TO
ATTN OF:

M/S 530

MAR 03 1982

see pg 2

Daryl Koch
Senior Environmental Specialist
Division of the Environment
Department of Health & Welfare
Statehouse
Boise, Idaho 83720

Dear Mr. Koch:

We have made and enclosed copies of the RCRA Part A permit applications from the State of Idaho as requested in your January 29, 1982 letter to Linda Dawson. Also included is an updated list of facilities in Idaho showing their current status. The status comments are qualified as follows:

- initially qualified - application has passed Phase I review and facility initially qualifies for interim status
- interim status - application has passed Phase II review and facility has received a Phase II acknowledgement advising of qualification
- problems - facility has not qualified for interim status due to late submission of notification and/or Part A
- returned non-regulated facility's Part A has been returned by EPA because the application does not demonstrate that a RCRA permit is required
- application withdrawn - EPA has reviewed the application with the facility and the facility has formally withdrawn the application.

We are continuing to work with the Idaho Part A applicants and until a Phase II review is completed each is handled as a RCRA TSD facility. The Phase II verification process is often complex and time consuming and information you can provide on specific facilities will be of help. Please, however, do not advise facilities to withdraw applications since Linda Dawson should thoroughly discuss such action with the applicants.

USEPA RCRA



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Complex applicability questions posed by the facility or that arise in your minds during visits should be addressed to Linda. She has encountered nearly every possible situation since the regulations were published and is immediately up to date on all changes that occur.

The list of RCRA facilities which you submitted with your letter can be compared with the actual Part A applications and the updated status report. At this time we have no information on possible TSD's in Idaho which do not appear on our lists. We would welcome information you may have regarding any such potential TSD's for follow up.

In response to your questions regarding Arrcom, a storage facility does not have to receive 2200 pounds in a month to be a RCRA TSD, nor does it have to accumulate 2200 pounds before processing. Receipt of any amount of hazardous waste from a generator (as defined) which is a sludge, or which is listed in Subpart D of Part 261, or which contains one or more hazardous wastes listed in Subpart D classifies the facility as a RCRA TSD. Such facilities must have interim status or a permit to operate. Thus, for example, acceptance by Arrcom of just one drum of toluene from a RCRA generator classifies Arrcom as a TSD. Receipt of waste oil from a RCRA generator which contains a waste listed in Subpart D (e.g. toluene) also makes Arrcom a TSD. The 2200 pound standard is used only by facilities generating hazardous waste in determining whether they are "generators" or "small quantity generators."

I hope this information meets your needs. Please call Linda Dawson if you have further questions.

Sincerely,

Tobias A. Hegdahl

Tobias Hegdahl, Chief
Program Development Section

cc: J. Barich
D. Donaldson
S. Provant